

MEMORANDUM

DATE: November 2, 2006

SUBJECT: RCRA Compliance Inspection

FROM: Stacey Bennet-Dwyer, Chief
Surveillance Section (6EN-AS)

Stacey Bennett Dwyer

TO: Sam Tate, Chief
Texas Section (6EN-HT)

The attached RCRA inspection report has been prepared and reviewed by Compliance Assurance and Enforcement Division personnel. This report is being forwarded to you for your information and action.

Inspection dates: September 26, 2006 EPA ID Nos. TXD071378822

Name of Facility: UT Southwestern Medical Center Mailing Address: 5253 Harry Hines Blvd, Dallas, TX 75390-9053

Facility Owner: State of Texas UT System Description of Facility: Teaching Hospital

Type of Ownership: Federal ☒ State County Municipal Private

Did facility request a copy of the report: ☒ Yes No

HW Activities: ☒ Generator Transporter Treatment Disposal Storage (<90 day)

Type of Inspection: Lead Overview ☒ CEI PSMS Commitment
CME Land Ban MM BIF

INSPECTION PARTICIPANTS: (name and phone number)

EPA Inspector(s): David Robertson (214) 665-7363

State Inspector(s): None Facility Representative(s): Julien Farland 214.648.2466 (for others see attached report)

Comments: Please see the attached narrative report for information about the investigation, including the areas discussed during the out briefing conference.

Inspector Signature: *Julien Farland* Date: 11-2-06



**EPA REGION 6
SURVEILLANCE SECTION
RCRA CEI INSPECTION REPORT**

Report Date: November 2, 2006

Inspection Date: September 26, 2006

Type of Inspection: RCRA STARS Commitment

Company Name: UT Southwestern Medical
Center

Mailing Address: 5323 Harry Hines Blvd. Dallas, TX 75390-9053

Company Owner: University of Texas

Location: 5323 Harry Hines Blvd.

Type of Industry/SIC Medical Research/Education
Center

Identification Number: TXD071378822

Date put into ICIS September 27, 2006

Enforcement
Officer

EPA Inspector: David Robertson

Reviewed by:

David Roe 11-2-06
Signature Date
Lashunda Pauline 11-2-06
Signature Date

INTRODUCTION

On September 26, 2006, a Compliance Evaluation Inspection covering Resource Conservation and Recovery Act (RCRA) regulations was conducted at the University of Texas Southwestern Medical Center (UTSWMC) in Dallas, TX. The facility is located at 5323 Harry Hines Blvd., Dallas, Texas in Dallas County, Texas. This report details verification of compliance with RCRA regulations that control hazardous waste activities at the site. Under RCRA, the facility operates as a large quantity generator using EPA Identification No. TXD071378822.

On September 26, 2006, David Robertson, EPA Environmental Investigator, met with Julien Farland, Biological and Chemical Safety Specialist, Peter Harris, Biological and Chemical Safety Specialist and Terry Capone, Assistant to the Biological/Chemical Safety Officer. The inspector presented credentials and explained the nature of the inspection.

The inspector spoke by telephone with Dr Jose Lopez, Director Environmental Health and Safety during the closing conference.

BACKGROUND

The University of Texas Southwestern Medical Center (UTSWMC) is a teaching hospital with over one thousand satellite accumulation points and three permitted waste storage areas. The facility is inspected yearly as part of EPA's STARS commitment.

The facility previously operated under hazardous waste storage permit HW-50165 (Attachment 1). The facility closed all permitted units by September 11, 2006 (Attachment 2).

PERMIT CLOSURE

The facility notified TCEQ that they intended to close all permitted units on February 15, 2006 (Attachment 3). TCEQ accepted closure of Units 001, 002, and 003, on July 13, 2006 (Attachment 4). Units 005 and 006 were constructed but never operated. Units 004A through 004F were never constructed and closed by default on September 5, 2006 (Attachment 5). A summary of closure status is included as Attachment 6). The facility is required to notify TCEQ 10 days prior to physical closure of any units in order to allow the TCEQ to collect samples per Permit Section VII. A. 4. b. The facility failed to make that notification. However, the facility did get verbal deferment of the 10 day notification requirement from the TCEQ Region 4 office (Attachment 7).

The inspector observed the area where Permitted Storage Units 1 and 2 were closed and destroyed. The area was still undergoing construction/demolition. No hazardous waste was observed (Photo 43). The inspector observed closed Permitted Unit 3. This permitted storage unit is a small lab room adjacent to the environmental offices. The room contains a sink and a vapor hood. No waste was accumulated in this unit at the time of the inspection.

WASTE GENERATION AND DISPOSITION

The facility's approximately 1,500 laboratories generate spent solvents, mixed hazardous and radioactive wastes and other hazardous wastes. Laboratories in buildings K, NA, NC, J, G and C were observed. Labs in each of these buildings contained hazardous waste that was either being satellite accumulated or removed from satellite accumulation and staged for pickup.

Less than 90 day Storage Area

The facility operates a less than 90 day storage area in a modular building on the North Campus (Photo 44). The unit is air conditioned and well ventilated. The less than 90 day storage area was nearly empty at the time of the inspection.

Utilities

During the inspection, the South Thermal Plant was observed. A 5-gallon container of spent refractory brick was noted. The container was open and unlabeled (Photo 45). The facility could not document the hazardous waste determination for this material at the time of the inspection, however, the facility was able to provide documentation following the inspection that the brick was a non-hazardous waste (Attachment 9).

Mixed Waste Accumulation

The facility has numerous in lab satellite accumulation areas for their liquid scintillation mixed waste (D001). In addition, the facility has several "communal" accumulation areas at or near the point of generation which may meet the definition of satellite accumulation areas (Attachment 10). In two locations, Rooms NB1.302 and G1.200, the facility operates < 90 day containers for mixed waste that has been previously satellite accumulated (see Attachment 10 #6 a)

Room NB 1.302 contained two 55-gallon drums liquid scintillation waste. One of the drums was ½ full and the other was full (Photos 47 and 48). The drums were not labeled hazardous waste but were dated by a receipt log affixed to the tops of the drums. The waste in these drums has been previously satellite accumulated at points throughout the facility. According to Reggie Giddens, Safety Technician, these drums take between one and five months to fill and be sent off-site for disposal. This waste is disposed by Permafix in Gainesville, Florida. According to the log on the top of these drums, the first waste was placed in them on June 27, 2006 and September 15, 2006. (Attachment 11).

Room NA6.504 contained one 55-gallon drum of liquid scintillation waste. According to the log on the top of the drum, the first waste was placed into this container on December 3, 2004. This drum was approximately 80% filled (Photos 49 and 50).

Room NB4.104 contained one 55-gallon drum of liquid scintillation waste. According to the log on the top of the drum, the first waste was placed into this container on January 20, 2006. This

drum was approximately 95% filled (Photos 51 and 52).

Room J3.155 contained two 55-gallon drums of liquid scintillation waste. According to the log on the top of the drums, the first waste was placed into the container on the left on June 9, 2006 and into the container on the right on June 27, 2006. Each drum was approximately 80% filled (Photo 54). At the time of the inspection, it was not clear when the 55-gallon satellite accumulation limit was reached. The facility needs to ensure that the initial date of excess accumulation is marked on drums when the 55-gallon limit is reached.

Room G1.200 contained two 55-gallon drums of liquid scintillation waste. According to the log on the top of the drums, the first waste was placed into the container on the left on September 6, 2006 and into the container on the right on July 13, 2006 (Attachment 11). The drum on the left was approximately 60% full and the drum on the right was approximately 90% full. This waste was previously satellite accumulated and this location is considered a < 90 day storage area. The drums were not labeled hazardous waste but were dated by a receipt log affixed to the tops of the drums.

According to Dr. Lopez, who spoke by telephone during the closing conference, the drums containing mixed waste that has not been previously satellite accumulated meet the definition of satellite accumulation containers. They are kept in locked rooms near the points of generation with access granted to and controlled by the generators. Mr. Lopez stated that although some of the satellite accumulation areas contained more than 55-gallons of liquid scintillation vials, the actual waste - the liquid scintillation cocktail itself - makes up only a minute portion of that volume. Dr. Lopez estimated that each 55-gallon drum filled with scintillation cocktail ampules contained only eight gallons of actual scintillation waste. The inspector believes that the facility may consolidate their waste to extend the period of satellite accumulation, however, at the time of the inspection, the waste was the material in the drums (liquid, ampules and empty space). When that waste reaches 55-gallons the facility begins excess accumulation.

RECORDS REVIEW

The facility is in the process of updating their contingency plan and other preparedness and prevention documentation now that their permit is no longer in effect. Manifests and LDR's for 2005 were observed. It was noted that the facility incinerated osmium tetroxide (P087; Attachment 8). The only acceptable methods of disposal of this waste listed in the LDR is metals recovery.

AREAS OF CONCERN

1. 40 CFR 268.40 - Land Disposal Restrictions

During the inspection, it was noted that the facility incinerated osmium tetroxide (P087). The only acceptable methods of disposal of this waste listed in the LDR is metals recovery.

2. 40 CFR 262.34 (c)(2) - Satellite Accumulation

During the inspection, it was noted that the facility accumulated more than 55-gallons of hazardous waste in a satellite accumulation area in room Room J3.155 without marking the initial date of excess accumulation. It was requested that the facility ensure that satellite accumulation areas are properly marked. Alternatively, the facility may wish to apply for the low level radioactive waste storage exemption or cease generating hazardous waste by switching to a scintillation cocktail using a non-hazardous solvent.

3. 40 CFR 262.34 (c)(1)(a)(ii) - Satellite Accumulation

During the inspection, it was noted that the facility satellite accumulated waste in 55-gallon containers without labeling the drums with the words "hazardous waste" or with the contents of the container. It was requested that the facility properly label the drums.

4. 40 CFR 262.34 (a)(3) - Accumulation in Containers

During the inspection, it was noted that the facility accumulated hazardous waste in 55-gallon containers in less than 90 day storage areas without labeling the drums with the words "hazardous waste" or with the contents of the container. It was requested that the facility properly label the drums.

AREAS OF CONCERN RESOLVED DURING THE CURRENT INSPECTION

1. 40 CFR 262.40 (c) - Hazardous Waste Determination Documentation

During the inspection, it was noted that the facility could not locate the hazardous waste determination for spent refractory brick. The documentation was forwarded to the EPA within two weeks of the inspection.

2. Permit Section VII. A. 4. b - Notification Prior to Sampling

The facility was required to notify TCEQ 10 days prior to physical closure of any units in order to allow the TCEQ or EPA to collect samples. The facility failed to make that notification. However, the facility did get verbal deferment of the 10 day notification requirement from the TCEQ Region 4 office.

OTHER AREAS OF CONCERN

During the inspection, it was noted that the facility satellite accumulated waste scintillation cocktail in 55-gallon drums in several locations throughout the facility. In several of these locations, more than 55-gallons of the cocktail was accumulated without labeling and dating the container as required by 40 CFR 262.34 c 2. It was suggested that

UT Southwestern Medical Center

TXD071378822

November 2, 2006

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the facility apply for the low level radioactive waste storage exemption or switch to scintillation cocktail using a non-hazardous solvent.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log



Photo # 43

| | | |
|---|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: Former location of "Little House" – Permitted units 1 and 2. The facility failed to notify TCEQ 10 days prior to closure environmental sampling as required by their permit. | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

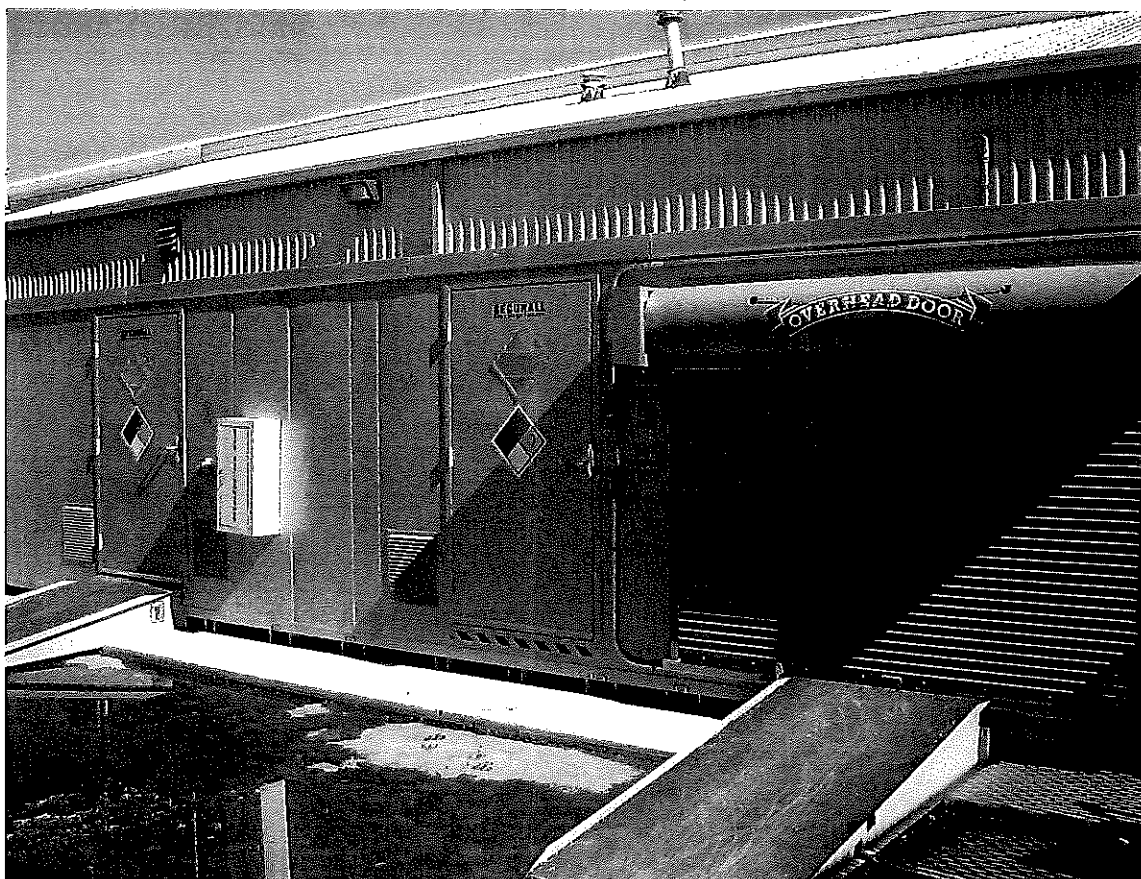


Photo # 44

| | | |
|--|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: New <90 day storage area. | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log



Photo # 45

| | | |
|---|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: Spent refractory brick from boiler. The facility did not have an adequate hazardous waste determination for this waste at the time of the inspection. Following the inspection, the facility provided information which indicated that this waste was non-hazardous. | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log



Photo # 47

| | | |
|--|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: Full drum of mixed liquid scintillation waste in room NB1.302. The drum was not labeled with the words "hazardous waste" or with the contents of the container. | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

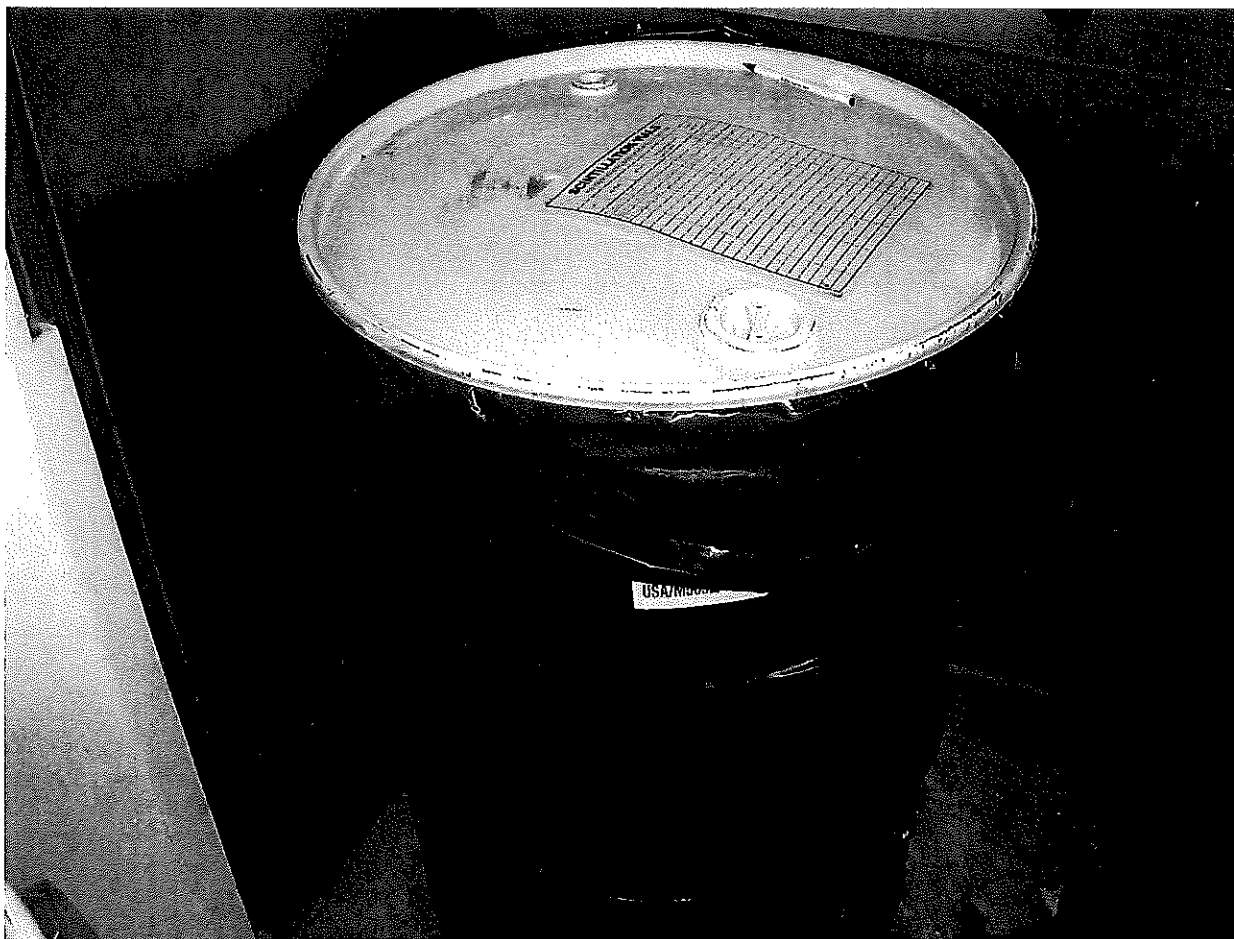


Photo # 48

| | | |
|--|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: ½ filled drum of mixed liquid scintillation waste in room NB1.302. The drum was not labeled with the words “hazardous waste” or with the contents of the container. | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

RS-50

SCINTILLATION

ADD LOOSE VIALS (NO BAGS OR BOXES)

| DATE | ISOTOPE | ACTIVITY | FROM W INVESTIG |
|----------|-----------|----------|-----------------|
| 12/3/04 | Wipe test | N/A | N. VAN C |
| 12/10/04 | 30 P | N/A | K MC |
| 12/11/04 | 30 P | N/A | K MC |
| 12/14/04 | 30 P | N/A | K MC |
| 12/14/04 | 30 P | N/A | K MC |
| 12/15/04 | 30 P | N/A | K MC |
| 12/15/04 | 30 P | N/A | K MC |
| 12/15/04 | 30 P | N/A | K MC |

Photo # 49

| | | |
|---|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| <p>Subject: Label on top of 55-gallon drum of liquid scintillation waste. The drum was 80% full and was accumulated in Room NA6.504. According to the log sheet the first material in the drum was placed there 12/3/04. The drum was not labeled with the words "hazardous waste" or with the contents of the container.</p> | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

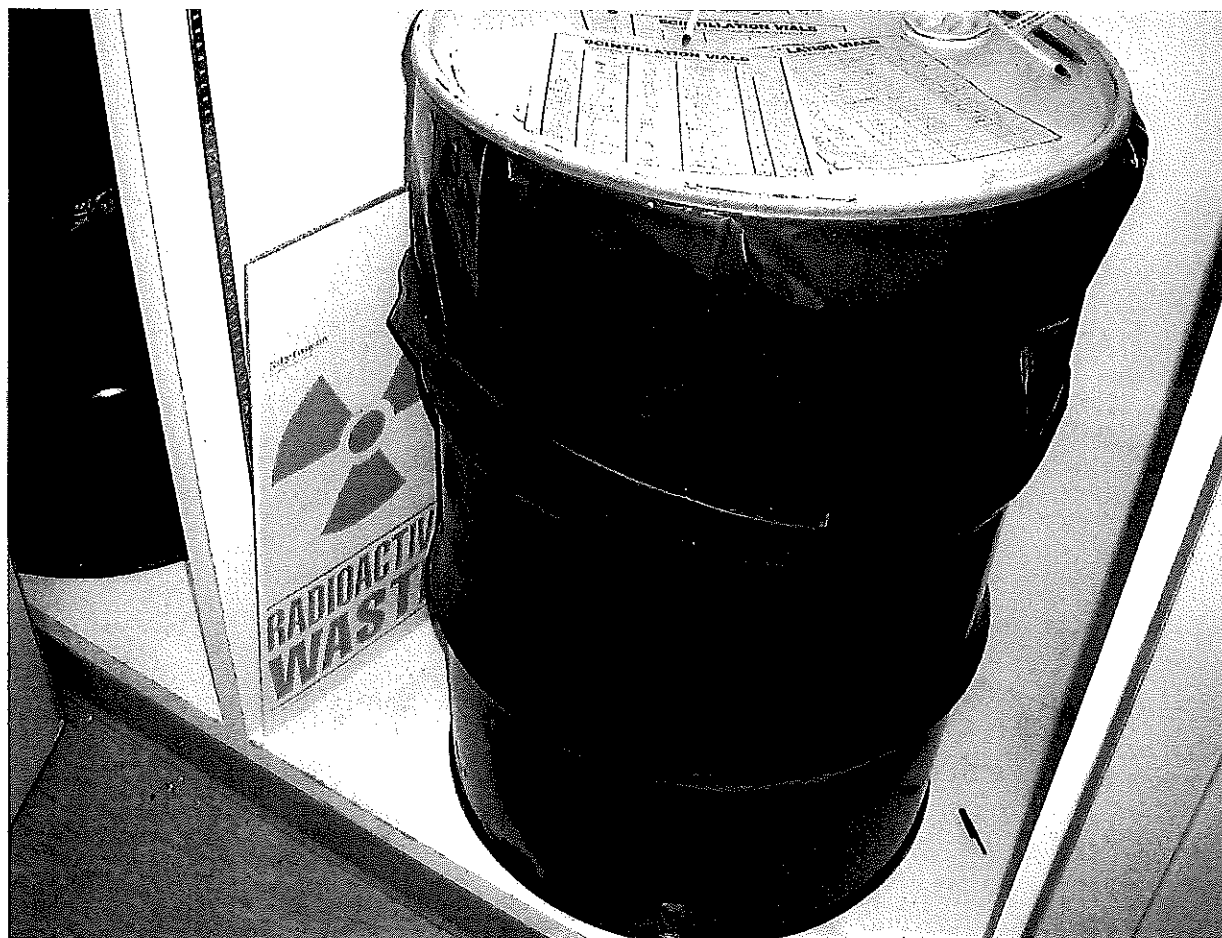


Photo # 50

| | | |
|---|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: Drum seen in Photo 49. The drum was not labeled with the words "hazardous waste" or with the contents of the container | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log

RS-50

SCINTILLATION VIA

ADD LOOSE VIALS (NO BAGS OR BOXES), FILL O

| DATE | ISOTOPE | ACTIVITY | FROM WHOSE LA INVESTIGATOR |
|---------|---------|----------|-------------------------------|
| 1/10/06 | " | " | TCS |
| 2/2/06 | " | " | " |
| 3/5/06 | " | " | " |
| 4/3/06 | " | " | " |
| 4/11/06 | " | " | " |
| 4/21/06 | " | " | NPS |
| | | | |

Photo # 51

| | | |
|--|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: Log on top of 55-gallon drum containing spent scintillation fluid in room NB4.104. The drum was approximately 95% full and was not labeled with the words "hazardous waste" or with the contents of the container | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log



Photo # 52

| | | |
|---|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| Subject: Exterior of drum seen in Photo 51. The drum was not labeled with the words "hazardous waste" or with the contents of the container | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log



Photo #54

| | | |
|--|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| <p>Subject: Two 55-gallon drums containing liquid scintillation waste accumulated in Room J3.155. Each drum is approximately 80% full. The drum on the left first received waste on 6/9/06 the drum on the right first received waste 6/27/06. The facility considers these drums satellite accumulation drums, however, the initial date of excess accumulation was not marked and the drums were not labeled with the words "hazardous waste" or with the contents of the container.</p> | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Official Photograph Log



Photo #56

| | | |
|---|---------------|--------------|
| Photographer: David Robertson | Date: 3/26/06 | Time: |
| City/County: Dallas, Dallas County | | State: Texas |
| Location: U.T. Southwestern Medical Center | | |
| <p>Subject: Room G1.200, South campus rad room. Two 55-gallon drums containing liquid scintillation fluid. The drum on the left was 60% full at the time of the inspection and first received waste on 9/6/06. The drum on the right was 90% full and first received waste on 7/13/06. This waste was previously satellite accumulated elsewhere. The drums were not labeled "hazardous waste" or with the contents of the container and were dated by the log sheet on top of the drums.</p> | | |

ATTACHMENT 1

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

March 10, 2000

RECEIVED

MAR 13 2000

T.N.R.C.C.
REGION 4

Donald E. Carlson, Ph.D
University of Texas Southwestern Medical Center at Dallas
5323 Harry Hines Blvd.
Dallas, TX 75235-9053

RE: University of Texas Southwestern Medical Center at Dallas
Permit No. HW - 50165

Dear Dr. Carlson:

Enclosed is a copy of the above referenced Permit for a hazardous or solid waste facility issued pursuant to the Texas Health and Safety Code, Chapter 361.

Should you have any questions, please contact Mr. Dipak Bhakta of the Texas Natural Resource Conservation Commission's Waste Permits Division, Industrial and Hazardous Waste Permits Section (MC 130) at 512/239-2256.

Sincerely,

A handwritten signature in cursive script that reads "Dale Burnett".

Dale Burnett, Director
Waste Permits Division

DB/DGB/fp

Enclosure

cc: Mr. Dipak Bhakta, Waste Permits Division, Industrial and Hazardous Waste Permits Section

bcc: Mr. Randy Ammons, TNRCC Regional Director, Region 4 - Arlington



PERMIT NO. HW-50165-000
EPA ID. NO. TX D071378822
ISWR NO. 65014

This permit supersedes and replaces
Permit No. HW- 50165-000
Issued December 6, 1988.

Texas Natural Resource
Conservation Commission
Austin, Texas

PERMIT FOR INDUSTRIAL SOLID
WASTE MANAGEMENT SITE issued
under provisions of TEXAS HEALTH AND
SAFETY CODE ANN.
Chapter 361 (Vernon)

Name of Permittee: University of Texas Southwestern Medical Center at Dallas
5323 Harry Hines Boulevard
Dallas Texas 75235

Site Owner: University of Texas Southwestern Medical Center at Dallas
5323 Harry Hines Boulevard
Dallas Texas 75235

Classification of Site: Municipal hazardous solid waste storage and processing on-site,
Non-Commercial

The permittee is authorized to manage wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store and process wastes shall expire midnight, 10 years after the date of renewal permit approval. This permit was originally issued on December 6, 1988.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the Texas Natural Resource Conservation Commission has not been authorized. Those provisions marked with a double asterisk (**) stem from federal authority only.

ISSUED: MAR - 1 2000

A handwritten signature in black ink, reading "Jeffrey A. Suter".

For The Commission

Permittee University of Texas Southwestern Medical Center at Dallas

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- C - List of Incorporated Application Materials
- D - List of Permitted Facility Units
- E - Emission Sources - Maximum Allowable Emission Rates

PERMIT SECTION I. - FACILITY DESCRIPTIONA. SIZE AND LOCATION OF SITE

A permit is issued to University of Texas Southwestern Medical Center at Dallas (hereafter called the permittee), to operate a hazardous waste processing and storage facility located at 5323 Harry Hines Blvd, in Dallas County, Texas, drainage area of Segment 822 in the Elm Fork Trinity River Basin (North Latitude 32° 48' 44", West Longitude 96° 50' 26"). The legal description of the facility submitted in permit No. HW- 50165-000 application dated June 3, 1998 is hereby made a part of this permit as "Attachment A". The hazardous waste management facility as delineated by the permittee's application map is hereby made a part of this permit as "Attachment B".

B. INCORPORATED APPLICATION MATERIALS

This permit is based on, and the permittee shall follow the Part A and Part B Industrial and Hazardous Waste Application elements listed in "Attachment C", which are hereby approved subject to the terms of this permit and any other orders of the TNRCC. These materials are incorporated into this permit by reference as if fully set out herein. Any and all revisions to these elements shall become conditions of this permit upon the date of approval by the Commission.

PERMIT SECTION II. - GENERAL FACILITY STANDARDSA. STANDARD PERMIT CONDITIONS

The permittee has a duty to comply with the Standard Permit Conditions under 30 TAC Section 305.125. Moreover, the permittee has a duty to comply with the following permit conditions:

1. Modification of Permitted Facilities

The facility units and operational methods authorized are limited to those described herein and by the application submittals identified in Provision I.B. (Incorporated Application Materials). All facility units and operational methods are subject to the terms and conditions of this permit and TNRCC rules. Prior to constructing or operating any facility units in a manner which differs from either the related plans and specifications contained in the permit application or the limitations, terms or conditions of this permit, the permittee must comply with the TNRCC permit amendment/modification rules as provided in 30 TAC Sections 305.62 and 305.69.

2. Duty to Comply

[30 TAC Section 305.142] The permittee must comply with all the conditions of this permit, except that the permittee need not comply with the conditions of this

[II.A.2.]

permit to the extent and for the duration such noncompliance is authorized in an emergency order issued by the Commission. Any permit noncompliance, other than noncompliance authorized by an emergency order, constitutes a violation of RCRA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

3. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

4. Definitions

For purposes of this permit, terms used herein shall have the same meaning as those in 30 TAC Chapters 305 and 335, unless this permit specifically provides otherwise; where terms are not defined in the regulations or the permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

Application data - data used to complete the final application and any supplemental information.

5. Permit Expiration

In order to continue a permitted activity after the expiration date of the permit the permittee shall submit a new permit application at least 180 days before the expiration date of the effective permit, unless permission for a later date has been granted by the Executive Director. Authorization to continue such activity will terminate upon the effective denial of said application.

6. Certification Requirements

[30 TAC Section 305.144] For a new facility, the permittee may not commence storage, processing, or disposal of solid waste; and for a facility being modified, the permittee may not process, store or dispose of solid waste in the modified portion of the facility, except as provided in 30 TAC Section 305.69 (relating to Solid Waste Permit Modification at the Request of the Permittee) until the following has been accomplished:

[II.A.6.]

- a. The permittee has submitted to the Executive Director and the local Regional Office of the TNRCC, by certified mail or hand delivery, a letter signed by the permittee, and signed and sealed by a Texas Registered Professional Engineer stating that the facility has been constructed or modified in compliance with the permit. If the certification is being provided to document proper closure of a permitted unit, or to certify installation or repair of a tank system, then the certification must be signed and sealed by an independent Texas registered Professional Engineer. Required certification shall be in the following form:

"This is to certify that the following activity (Specify activity, e.g., construction, installation, closure, etc., of an item) relating to the following item (Specify the item, e.g., the particular facility, facility unit, unit component, subcomponent part, or ancillary component), authorized or required by TNRCC Permit No.HW-50165-000 , has been completed, and that construction of said facility component has been performed in accordance with and in compliance with good engineering practices and the design and construction specifications of Permit No.HW- 50165- 000.

- b. A certification report has been submitted, with the certification described in Provision II.A.6., which is logically organized and describes in detail the tests, inspections, and measurements performed, their results, and all other bases for the conclusion that the facility unit, unit component, and/or closure have been constructed, installed and/or performed in conformance with the design and construction specifications of this permit and in compliance with this permit. The report shall describe each activity as it relates to each facility unit or component being certified including reference to all applicable permit provisions. The report shall contain the following items, at a minimum:

- (1) Scaled, as-built plan-view and cross-sectional drawings which accurately depict the facility unit and all unit components and subcomponents and which demonstrate compliance with the design and construction specifications approved and detailed in the terms of this permit;
- (2) All necessary references to dimensions, elevations, slopes, construction materials; thickness and equipment; and
- (3) For all drawings and specifications, the date, signature, and seal of a Professional Engineer who is registered in the State of Texas.

[II.A.6.]

- c. The Executive Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or if within 15 days of submission of the letter required by paragraph (a) of this section, the permittee has not received notice from the Executive Director of the intent to inspect, prior inspection is waived and the permittee may commence processing, storage, or disposal of solid waste.

* 7. Land Disposal Restrictions

The permittee shall comply with the land disposal restrictions as found in 40 CFR 268 and any subsequent applicable requirements promulgated through the Federal Register. Requirements include modifying/amending the permittee's waste analysis plan to include analyses to determine compliance with applicable treatment standards or prohibition levels, pursuant to 40 CFR 268.7(c) and 264.13(a).

8. Permit Reopener (Not Applicable)

9. Dust Suppression

Pursuant to 40 CFR 266.23(b)/30 TAC Section 335.214(b), the permittee shall not use waste, used oil, or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability) for dust suppression or road treatment.

10. Texas Coastal Management Program (Not Applicable)

11. Monitoring of Commercial Hazardous Waste Management Facility Operations (Not Applicable)

B. RECORDKEEPING AND REPORTING REQUIREMENTS

1. Monitoring and Records

- a. All data submitted to the TNRCC shall be in accordance with the latest version of the Quality Assurance Project Plan for the Texas Natural Resource Conservation Commission for Environmental Monitoring and Measurement Activities Relating to the Resource Conservation and Recovery Act (TNRCC QAPP).
- b. [30 TAC Section 305.125(11)(A)] Monitoring samples and measurements shall be taken at times and in a manner so as to be representative of the monitored activity. The method used to obtain a representative sample of the material to be analyzed shall

[II.B.1.b.]

be the appropriate method from Appendix I of 40 CFR Part 261 or an equivalent method approved by the Executive Director of the TNRCC. Laboratory methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, 1987, as revised; *Standard Methods for the Examination of Water and Wastewater, Fifteenth Edition*, 1980, and 1981 supplement, or current adopted edition; *RCRA Ground-Water Monitoring: Draft Technical Guidance*, 1992, OSWER Directive 9950.1.

- c. [30 TAC Section 305.125(11)(B)] The permittee shall retain in an organized fashion and furnish to the Executive Director, upon request, records of all monitoring information, copies of all reports and records required by this permit, and the certification required by 40 CFR 264.73(b)(9), for a period of at least 3 years from the date of the sample, measurement, report, record, certification, or application.
- d. [30 TAC Section 305.125(11)(C)] Records of monitoring shall include the following:
 - (1) The date, time, and place of sample or measurement;
 - (2) The identity of individual who collected the sample or measurement;
 - (3) The dates analyses were performed;
 - (4) The identity of individual and laboratory who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses or measurements.

2. Operating Record

In addition to the recordkeeping and reporting requirements specified elsewhere in this permit, the permittee shall maintain a written operating record at the facility, in accordance with 40 CFR 264.73. These records will be made available to representatives of the TNRCC upon request.

3. Retention of Application Data

[30 TAC Section 305.47] A permittee shall keep records throughout the term of the permit of data used to complete the final application and any supplemental information. All copies of renewals, amendments, revisions and modifications must also be kept at the facility such that the most current documents are available for inspection at all times. All materials, including any related information, submitted to complete the application shall be retained, not just those materials which have been incorporated into the permit.

[II.B.]

4. Reporting of Noncompliance

The permittee shall report to the Executive Director of the TNRCC information regarding any noncompliance which may endanger human health or the environment. [30 TAC Section 305.125(9)]

- a. Report of such information shall be provided orally within 24 hours from the time the permittee becomes aware of the noncompliance.
- b. A written submission of such information shall also be provided within five days of the time the permittee becomes aware of the noncompliance. The written submission shall contain the following:
 - (1) a description of the noncompliance and its cause;
 - (2) the potential danger to human health or safety, or the environment;
 - (3) the period of noncompliance, including exact dates and times;
 - (4) if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
 - (5) steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance, and to mitigate its adverse effects.

5. Twenty-Four Hour Reporting

The following shall be included as information which must be reported orally within 24 hours pursuant to Title 30 TAC Section 305.125(9): [30 TAC Section 305.145]

- a. Information concerning release of any solid waste that may cause an endangerment to public drinking water supplies;
- b. Any information of a release or discharge of solid waste, or of a fire or explosion which could threaten the environment or human health or safety, outside the facility. The description of the occurrence and its cause shall include:
 - (1) name, address, and telephone number of the owner or operator;
 - (2) name, address, and telephone number of the facility;
 - (3) date, time, and type of incident;
 - (4) name and quantity of material(s) involved;

[II.B.5.b.]

- (5) the extent of injuries, if any;
- (6) an assessment of actual or potential hazards to the environment and human health or safety outside the facility, where this is applicable; and
- (7) estimated quantity and disposition of recovered material that resulted from the incident.

6. Notice Waiver

[30 TAC Section 305.145(b)] The Executive Director may waive the five-day written notice requirement specified in Provision II.B.4.b. (Reporting of Noncompliance) in favor of a written report submitted to the Commission within 15 days of the time the permittee becomes aware of the noncompliance or condition.

7. Biennial Report

The permittee shall prepare and submit to the Executive Director a Biennial Report. One copy of the report shall be submitted to the TNRCC Industrial and Hazardous Waste Permits Section and an additional copy shall be submitted to the appropriate TNRCC Regional Office by March 1st of each even-numbered year for the preceding odd-numbered year's activities. This report shall include, at a minimum, all information and records required by 40 CFR 264.75.

8. Pollution Prevention

Facilities subject to 30 TAC Chapter 335, Subchapter Q - Pollution Prevention: Source Reduction and Waste Minimization, must prepare a five year Source Reduction and Waste Minimization Plan and submit a Source Reduction and Waste Minimization Annual Report (SR/WMAAR) to the TNRCC Office of Pollution Prevention and Recycling. This report must be submitted annually on the dates specified in the rule.

9. Waste Minimization

The permittee shall annually certify, by January 25th for the previous calendar year, the following information, [40 CFR 264.73(b)(9)]:

- a. that the permittee has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the permittee's facility operation to the degree determined to be economically practicable; and
- b. that the proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment. This waste minimization certification is to be included in the facility operating records until closure.

[II.B.]

10. Annual Detection Monitoring Report (Not Applicable)
11. Manifest Discrepancy Report (Not Applicable)
12. Unmanifested Waste Report (Not Applicable)
13. Monthly Summary (Not Applicable)

C. INCORPORATED REGULATORY REQUIREMENTS1. State Regulations

The following TNRCC regulations are hereby made provisions and conditions of this permit. Issuance of this permit with incorporated rules in no way exempts the permittee from compliance with any other applicable state statute and/or Commission Rule.

- a. 30 TAC Section 305.125
- b. 30 TAC Section 305.128
- c. 30 TAC Chapter 305, Subchapter G;
- d. 30 TAC Chapter 335, Subchapter A;
- e. 30 TAC Chapter 335, Subchapter B;
- f. 30 TAC Section 335.152;
- g. 30 TAC Sections 335.153 - 335.155;
- h. 30 TAC Sections 335.177 - 335.178;
- i. 30 TAC Chapter 335, Subchapter Q
- j. 30 TAC Chapter 335, Subchapter S.

2. Federal Regulations

To the extent applicable to the activities authorized by this permit, the following provisions of 40 CFR Part 264 adopted by reference by 30 TAC Section 335.152 are hereby made provisions and conditions of this permit, to the extent consistent with the Texas Solid Waste Disposal Act, Texas Health and Safety Code Ann., Chapter 361 (Vernon), and the rules of the TNRCC:

- a. Subpart B -- General Facility Standards;
- b. Subpart C -- Preparedness and Prevention;
- c. Subpart D -- Contingency Plan and Emergency Procedures;

[II.C.2.]

- d. Subpart E -- Manifest System, Recordkeeping, and Reporting;
- e. Subpart G -- Closure and Post-closure;
- f. Subpart I -- Use and Management of Containers;
- g. Subpart CC -- Air Emission Standards for Tanks, Surface Impoundments, and containers.

PERMIT SECTION III. - FACILITY MANAGEMENT

A. OPERATION OF FACILITY

The permittee shall construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, as required by 40 CFR 264.31. All equipment and structures used to manage hazardous waste at the facility shall be maintained in proper operating condition.

B. PERSONNEL TRAINING

The permittee shall ensure that all facility personnel involved with hazardous waste management successfully complete a training program as required by 40 CFR 264.16. The permittee shall maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

C. SECURITY

1. The permittee shall provide and maintain an artificial or natural barrier which completely surrounds the active waste management portions of the facility and shall have a means to control entry, at all times, through gates or other entrances to these same facility areas.
2. The permittee shall post warning signs at all points of access to the active waste management portions of the facility and along the natural and/or artificial barriers in sufficient numbers to be seen from any approach to those portions of the facility. The signs shall be printed so that they may be clearly read from a distance of at least 25 feet, and shall state "Danger - Unauthorized Personnel Keep Out" in English.

D. GENERAL INSPECTION REQUIREMENTS

The permittee shall follow the inspection schedule contained in the permit application submittals identified in Provision I.B. (Incorporated Application Materials) and as set out in Table III.D.-Inspection Schedule. The permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 40 CFR 264.15(c). Records of inspection shall be kept, as required by 40 CFR 264.15(d). Any remedial actions taken in response to facility inspections and the date of the remediation shall be included in the inspection records.

[III.]

E. CONTINGENCY PLAN

1. The permittee shall follow the Contingency Plan, developed in accordance with 40 CFR Part 264 Subpart D, and contained in the permit application submittals identified in Provision I.B. (Incorporated Application Materials). Copies of this plan shall be available to all employees involved in waste management at the facility.
2. The permittee shall immediately initiate clean-up procedures for removal of any spilled hazardous or industrial nonhazardous wastes and waste residues and shall take all steps necessary to prevent surface-water or groundwater contamination as a result of any spills.
3. Collected hazardous or industrial nonhazardous wastes, spills, leaks, clean-up residues, and contaminated rainfall runoff, including contaminated stormwater from the drainage control system(s) associated with the permitted units, shall be removed promptly after the spillage and/or rainfall event in as timely a manner as is necessary to prevent overflow of the system by the following method(s):
 - a. Removal to an on-site authorized facility unit;
 - b. Removal to an authorized industrial solid waste management facility or authorized off-site facility; or
 - c. Discharge in accordance with a wastewater discharge permit.
4. The permittee shall ensure that any equipment or vehicles which have come in contact with waste in the loading/unloading, storage, processing, and/or disposal areas have been decontaminated prior to their movement into designated uncontaminated areas of the site property. At a minimum, all contaminated equipment shall be externally decontaminated and contaminated vehicles shall have their undercarriages and tires or tracks decontaminated to remove all waste residues and to prevent contamination of uncontaminated areas. All wash water generated shall be collected and disposed of in accordance with Provision II.E.3.
5. Preparedness and Prevention
 - a. At a minimum, the permittee shall equip the facility as set forth in Table III.E.3.- Emergency Equipment, as required by 40 CFR 264.32.
 - b. All sumps, pumps, fire- and spill-control equipment, decontamination equipment, and all other equipment and structures authorized or required through the Contingency Plan shall be tested and maintained, as necessary, to assure its proper operation in time of emergency, as required by 40 CFR 264.33.

[III.E.5.]

- c. The permittee shall maintain access to the communications or alarm system, as required by 40 CFR 264.34.
- d. A trained emergency coordinator shall be available at all times in case of an emergency and will have the responsibility for coordinating all emergency response measures as required by 40 CFR 264.55 and 264.56. Emergency number(s) shall be posted in all waste management portions of the facility and all employees in those areas shall be trained in the location of those postings.

F. SPECIAL PERMIT CONDITIONS (Not Applicable)

TABLE III.D. INSPECTION SCHEDULE

| <i>Facility Unit(s) and Basic Elements</i> | <i>Possible Error, Malfunction, or Deterioration</i> | <i>Frequency of Inspection</i> |
|---|---|--------------------------------|
| Loading/unloading areas | Spillage | Daily (when in use) |
| Storage Areas | Signs of seepage from building warning signs not in place | Weekly Weekly |
| Environmental Control Process Area | Signs of seepage from building Warning signs not in place | Weekly Weekly |
| Main on-campus roadways used by hazardous waste vehicles | Signs of spillage Deterioration of surface or excessive potholes which may affect transporting of hazardous waste | Daily (when in use) Monthly |
| Safety and Emergency Equipment Items | | |
| Standard industrial absorbents (Sorb-All vermiculite, etc) | Out of stock | Monthly as needed |
| Absorbent pads | Out of stock | Monthly as needed |
| 55-gallon drums (PVC) | Cracking, structural damage | Monthly |
| Emergency shower and eyewash | Water pressure, leaking, damage | Weekly |
| Face shields and extra protective eyeglasses | Broken or dirty equipment | Monthly |
| Disposable respirators | Out of stock | Monthly as needed |
| Chest-mounted gas mask canisters | Canisters become exhausted | Monthly/after each use |
| Chemical cartridge respirator with cartridges for organic vapors and acid gases; half-and full-face types | Spent chemical absorbent, seals | Monthly/after each use |
| Self-contained breathing apparatus (SCBA) | Air quality in reserve, air delivery system moisture in tank (cold weather) | Monthly/after each use |
| Fire blankets | Dispensing | As used |
| Fire extinguishers | Needs recharging | Monthly/after each use |
| Fire alarm system | Power failure | Per NFPA (monthly) |

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TABLE III. D. INSPECTION SCHEDULE (con't)

| <i>Facility Unit(s) and Basic Elements</i> | <i>Possible Error, Malfunction, or Detection</i> | <i>Frequency of Inspection</i> |
|---|---|--------------------------------|
| Telephone system | Power failure | Per NFPA (monthly) |
| Two-way radios | Reception Transmission | Daily Daily |
| Emergency lighting system | Battery failure, lights | Per NFPA (monthly) |
| First-aid equipment and supplies | Items out of stock or inoperative | Monthly (as used) |
| Steam cleaner | Water supply, fuel supply | Monthly (as used) |
| Protective clothing (impermeable full body coveralls gloves and foot coverings) | Holes, normal wear and tear | Monthly |
| Security Device Items | | |
| Lighting | Power Burned out/broken bulbs | Daily Daily |
| Locks | Sticking Corrosion | Weekly Weekly |
| Operating and Structural Equipment Items | | |
| Dikes | Cracks, deterioration | Weekly |
| Bases or foundations | Erosion; uneven settlement; cracks and spalling in concrete pads, base rings and piers; wet spots | Weekly |
| Ramps | Erosion; uneven; cracks and spalling in concrete | Weekly |
| Sump areas | Erosion; uneven settlement; cracks and spalling in concrete; wet spots | Weekly |
| Storage areas | Leaks, spills | Daily |
| Ventilation system | Leaks, corrosion Inadequate face velocities Power | Weekly Monthly Daily |

TABLE III. D. INSPECTION SCHEDULE (con't)

| <i>Facility Unit(s) and Basic Elements</i> | <i>Possible Error, Malfunction, or Detection</i> | <i>Frequency of Inspection</i> |
|--|---|--------------------------------|
| Container Storage Area | | |
| Container placement and stacking | Aisle space, height of stacks | Daily |
| Sealing of containers | Open lids | Daily |
| Labeling containers | Improper identification, date missing | Weekly |
| Containers | Corrosion, leakage, structural defects | Weekly |
| Segregation of incompatible wastes | Storage of incompatible wastes in same area | Daily |
| Pallets | Damaged (e.g. broken wood, warping, nails, missing) | Weekly |
| Base or foundation | Cracks, spalling, uneven settlement, erosion, wet spots | Weekly |
| Dikes | Cracks, deterioration | Weekly |
| Debris and refuse | Aesthetics, possible reaction with leaks | Weekly |
| Ramps | Cracks, deterioration | Weekly |
| Warning signs | Damaged | Weekly |

TABLE III.E.3. EMERGENCY EQUIPMENT

| <i>Equipment</i> | <i>Location</i> | <i>Physical Description</i> | <i>Capabilities</i> |
|--|---|--|-----------------------------|
| Personal Protection Equipment | | | |
| Chemical resistant lab aprons | Storage area | Std. Chemical resistant apron | Cover clothing |
| Self contained breathing apparatus | Storage area | Scott Air-Paks or equivalent | 15 and 30 min. |
| Clear plastic face shield | Storage area | Std. Clear Plastic | Face protection |
| Portable eyewash | Acid Storage Building | Gravity feed eye wash | Flow rate 0.4 gpm |
| Emergency shower | S Building only | Plumbed shower | Flow rate 30 gpm |
| Emergency eyewash | S Building only | Plumbed shower | Flow rate 3.5 gpm |
| Emergency, Safety and Decontamination Equipment | | | |
| Standard industrial absorbent | Storage area Processing area Loading area | Absorbent - for example vermiculite or equivalent | Absorbs liquid materials |
| Absorbent pads | Storage area Processing area | Assorted size pads | Absorbs liquid materials |
| Shovel | Storage area Processing area | Spark resistant shovel - plastic or brass | Move solids |
| Broom and dustpan | Storage area Processing area | Small broom and dustpan | Sweep up dry materials |
| Portable pump | Storage area Processing area | Plastic hand pump | Transfer of liquids - 5 gpm |
| Empty 55 gal PVC drum | Storage area Processing area Loading area | PVC 55 gallon drum | 55 gallon rated capacity |
| Fire extinguisher | Storage area Processing area Loading area | ABC | 10 lb |

TABLE III.E.3. EMERGENCY EQUIPMENT (con't)

| <i>Equipment</i> | <i>Location</i> | <i>Physical Description</i> | <i>Capabilities</i> |
|------------------------|---------------------------------|--------------------------------------|--|
| Fire alarm system | Storage area Processing area | Notifier or equivalent | Fire detection |
| Telephone system | | Rollm phone or equivalent | 2 way communication |
| Emergency lighting | | Battery powered | provides lighting in case of power outage |
| First-aid kit | | Johnson and Johnson or equivalent | Provides 1 st aid material |
| Portable steam cleaner | | As per emergency contractor | Wash contaminated areas |
| Two-way Radios | | Kenwood or equivalent | Communication |
| CDAS system | | Sensor monitoring system | Remote equipment and area monitoring |
| Backhoe/fronted loader | Physical Plant | case Uniloaders or equivalent | Move small quantities of soil |
| Dumptruck | Physical Plant | Chevy C 60, 1979 or equivalent | Capacity: 8 yards 16,000 lbs |

PERMIT SECTION IV. - WASTES AND WASTE ANALYSISA. WASTE ANALYSIS PLAN

The permittee shall follow the Waste Analysis Plan, developed in accordance with 40 CFR 264.13 and the permit application identified in Provision I.B. (Incorporate Application Materials).

B. AUTHORIZED WASTES

1. The permittee is authorized to manage hazardous wastes listed in Table IV.B. - Wastes Managed in Permitted Units, subject to the limitations provided herein.

Wastes authorized for storage and processing include those generated from facility sources.

2. Hazardous Waste Received From Off-Site Sources

The Permittee may not receive hazardous and nonhazardous waste from off-site sources.

3. The wastes authorized in Table IV.B. shall not contain any of the following:

- a. Polychlorinated biphenyls (PCBs), as defined by the EPA in regulations issued pursuant to the Toxic Substances Control Act under Title 40 Code of Federal Regulations (CFR) Part 761, unless the permittee is compliant with the federal requirements for PCB storage as specified in 40 CFR Part 761;
- b. Radioactive wastes unless the permittee is authorized to store, process and dispose of these wastes in compliance with specific licensing and permitting requirements under Chapter 401 of the Texas Health and Safety Code and the rules of the Texas Natural Resource Conservation Commission or Texas Department of Health or Texas Railroad Commission, and/or any other rules of state or federal authorities;
- c. Explosive material as defined by the Department of Transportation under 49 CFR Part 173 except 20 chemical containers of 25 grams or less per container of materials under this category per permitted unit.
- d. Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in 40 CFR 261.31;
- e. Ignitable compressed gases except aerosol cans and not more than 6 lecture bottles or other small bottles of ignitable compressed gases per permitted unit. The total weight of each container and

[IV.B.3.]

- f. Municipal garbage; or
 - e. Special Waste from Health-Care Related Facilities subject to 25 TAC Chapter 1 or 30 TAC Chapter 330.
- 4. Prior to accepting any additional wastes not authorized in Table IV.B., the permittee shall follow the permit amendment or modification requirements listed in 30 TAC Sections 305.62 and 305.69.
- 5. The permittee may store wastes restricted under 40 CFR Part 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50(a)(2) including, but not limited to the following:
 - a. Clearly marking each container to identify its contents and the date each period of accumulation begins;
 - b. Clearly marking each tank with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility.

C. SAMPLING AND ANALYTICAL METHODS

- 1. Table IV.C. - Sampling and Analytical Methods, shall be used in conjunction with the Waste Analysis Plan referenced in Provision IV.A., in performing all waste analyses.
- 2. The permittee shall ensure that all waste analyses utilized for waste identification or verification have been performed in accordance with methods specified in the current editions of "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods", (SW-846), ASTM or other methods accepted by the TNRCC. The permittee shall have a QA/QC program that is consistent with EPA SW 846 and the TNRCC QAPP.

TABLE IV.B. WASTES MANAGED IN PERMITTED UNITS

| <i>No.</i> | <i>Waste</i> | <i>EPA Waste Codes</i> | <i>TNRCC Waste Codes</i> |
|------------|--|--|--------------------------|
| 1 | Hazardous lab/pack/use and out dated chemicals from biomedical research | All D listed wastes, F002, F003, F005 all P listed wastes, all U listed wastes | 0001003H |
| 2 | Waste Solvents and water/aqueous based waste from biomedical research | D001, F003, F005 | 0001003H |
| 3 | Waste halogenated solvents/solvent waste from biomedical research | D001, D019, D002, D029, D040, F002, F003, F005 | 0001003H |
| 4 | Petroleum oil/used motor oil and vacuum pump oil | D001 | 0001003H |
| 5 | Non-halogenated solvents/used and outdated chemicals from biomedical waste | D001, D018, D035, D038, F003, F005 | 0001003H |
| 6 | Waste paint/paint shop waste | D001, D035, F003, F005 | 0001003H |
| 7 | Non-halogenated solvents/scintillation cocktail | F003, F005 | 0001003H |
| 8 | Aqueous waste/photographic processing | D001, D011 | 0001003H |
| 9 | Lead scrap/used shipping and storing containers | D008 | 0001003H |

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TABLE IV.C. SAMPLING AND ANALYTICAL METHODS

| <i>Waste No.¹</i> | <i>Sampling Location</i> | <i>Sampling Method</i> | <i>Frequency</i> | <i>Parameter</i> | <i>Test Method</i> | <i>Desired Accuracy Level</i> |
|------------------------------|----------------------------|------------------------|------------------|--|---|-------------------------------|
| 1 | Point of Generation or lab | Grab Sample | Random | Identification pH Unknown Organic Toxicity TCLP | IR, Mass Spec, Gas Chromatograph EPA Method 9040B EPA Method 8260B or 8270C EPA Method 9020B EPA Method 1311 | 99% |
| 2 | Point of Generation or lab | Grab Sample | Random | Identification pH Toxicity TCLP | IR, Mass Spec, Gas Chromatograph EPA Method 9040B EPA Method 9020B EPA Method 1311 | 99% |
| 3 | Point of Generation or lab | Grab Sample | Random | Identification Unknown Organic | IR, Mass Spec, Gas Chromatograph EPA Method 8260B or 8270C | 99% |
| 4 | Point of Generation or lab | Grab Sample | Random | Identification | IR | 99% |
| 5 | Point of Generation or lab | Grab Sample | Random | Identification Unknown Organic TCLP | IR, Mass Spec, Gas Chromatograph EPA Method 8260B or 8270C EPA Method 1311 | 99% |
| 6 | Point of Generation or lab | Grab Sample | Random | Identification Metal Content Hg Pb TCLP | Atomic Absorption for metals Mass Spec, Gas Chromatograph EPA Method 7470A EPA Method 7420 or 7421 EPA Method 1311 | 99% |
| 7 | Point of Generation or lab | Grab Sample | Random | Identification Unknown Organic | Mass Spec, Gas Chromatograph EPA Method 8260B or 8270C | 99% |
| 8 | Point of Generation or lab | Grab Sample | Random | Identification TCLP | Atomic Absorption for metals Mass Spec, Gas Chromatograph EPA Method 1311 | 99% |
| 9 | Point of Generation or lab | Grab Sample | Random | Identification TCLP | Atomic Absorption for metals EPA Method 1311 | 99% |

¹from Table IV.B, first column

PERMIT SECTION V. - AUTHORIZED UNITS AND OPERATIONSA. AUTHORIZED UNITS

1. The permittee is authorized to operate the facility units listed in "Attachment D" for storage and processing subject to the limitations herein. All waste management activities not otherwise exempted from permitting under 30 Texas Administrative Code (TAC) Section 335.2 shall be confined to the authorized facility units listed in "Attachment D". References hereinafter in this permit to "TNRCC Permit Unit No. ___" shall be to the facility units listed in "Attachment D". All authorized units must be clearly identified as numbered in "Attachment D". These units must have signs indicating "TNRCC PERMIT UNIT NO. ___".
2. The permittee shall comply with 40 CFR 264.17, relating to general requirements for ignitable, reactive, or incompatible wastes.
3. The permittee shall prevent inundation of any permitted units and prevent any discharges of any waste or runoff of waste contaminated stormwater from permitted units. Additionally, each loading or unloading area, associated with a permitted hazardous or nonhazardous waste management unit, shall be provided with a drainage control system which will collect spills and precipitation in such a manner as to satisfy the following:
 - a. Preclude the release from the system of any collected spills, leaks or precipitation;
 - b. Minimize the amount of rainfall that is collected by the system; and
 - c. Prevent run-on into the system from other portions of the facility.

B. CONTAINER STORAGE AREAS

1. Container storage areas and their approved waste types are shown in Table V.B. - Container Storage Areas. The permittee is authorized to operate the facility container storage areas for storage and processing subject to the limitations contained herein.
2. Containers holding hazardous waste shall be managed in accordance with 40 CFR 264.171, Condition of containers; 40 CFR 264.172, Compatibility of waste with containers; and 40 CFR 264.173, Management of containers.
3. The permittee shall construct and maintain the containment systems for the container storage areas in accordance with the drawings and details included in the Part B Application. At a minimum, the containment system must meet the requirements of 40 CFR 264.175.

[V.]

- C. TANKS AND TANK SYSTEMS (NOT APPLICABLE)
- D. SURFACE IMPOUNDMENTS (NOT APPLICABLE)
- E. WASTE PILES (NOT APPLICABLE)
- F. LAND TREATMENT UNITS (NOT APPLICABLE)
- G. LANDFILLS (NOT APPLICABLE)
- H. INCINERATORS (NOT APPLICABLE)
- I. BOILERS (NOT APPLICABLE)
- J. DRIP PADS (NOT APPLICABLE)
- K. MISCELLANEOUS UNITS (NOT APPLICABLE)
- L. CONTAINMENT BUILDINGS (NOT APPLICABLE)

TABLE V.B CONTAINER STORAGE AREAS

| 10. | Container Storage Area | N.O.R. Unit # | Rated Capacity | Dimensions | Stacking height | Aisle Spacing | Containment Volume (including rainfall for unenclosed areas) | Unit will manage Ignitable ¹ , Reactive ¹ , or Incompatible ² Waste (state all that apply) |
|-----|--------------------------------|---------------|----------------|-----------------|-----------------|---------------|--|---|
| 1 | Acid Storage Bldg - Front Room | 001 | 1,170 Gal | 15' X 12'5" | 1 | Min 2 Ft | 462.1 Gal | Ignitable, Reactive or Incompatible |
| 2 | Acid Storage Bldg - Back Room | 002 | 963 Gal | 15' X 9'7" | 1 | Min 2 Ft | 390.6 Gal | Ignitable, Reactive or Incompatible |
| 3 | "S" Building | 003 | 30 Gal | 10' X 16' | 1 | Min 2 Ft | 209.4 Gal | Ignitable, Reactive or Incompatible |
| 4 | ECSC Flammable Storage # 1 | 004 A | 2,805 Gal | 17'-5" X 30'-1" | 1 | Min 2 Ft | 1270.3 Gal | Ignitable, Reactive or Incompatible |
| 5 | ECSC Flammable Storage # 2 | 004 B | 3,205 Gal | 17'-5" X 38'-1" | 1 | Min 2 Ft | 1463.8 Gal | Ignitable, Reactive or Incompatible |
| 6 | ECSC Chem Storage # 1 | 004 C | 720 Gal | 7'-11" X 11'-3" | 1 | Min 2 Ft | 106.9 Gal | Ignitable, Reactive or Incompatible |
| 7 | ECSC Chem Storage # 2 | 004 D | 720 Gal | 7'-11" X 11'-8" | 1 | Min 2 Ft | 102.8 Gal | Ignitable, Reactive or Incompatible |
| 8 | ECSC Chem Storage # 3 | 004 E | 240 Gal | 6'-9" X 8'-1" | 1 | Min 2 Ft | 59.6 Gal | Ignitable, Reactive or Incompatible |
| 9 | ECSC Lab | 004 F | 720 Gal | 24'-5" X 13'-5" | 1 | Min 2 Ft | 133.2 Gal | Ignitable, Reactive or Incompatible |

Containers managing ignitable or reactive waste shall be located at least 15 meters (50 feet) from the facility's property line.

Incompatible waste shall be separated from other waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments by means of a dike, berm, wall, or other device.

PERMIT SECTION VI. - GROUNDWATER DETECTION MONITORING (NOT APPLICABLE)

PERMIT SECTION VII. - CLOSURE AND POST-CLOSURE REQUIREMENTS

A. FACILITY CLOSURE

1. The permittee shall follow the closure plan, developed in accordance with 40 CFR Part 264 Subpart G, and contained in the permit application submittals identified in Provision I.B. (Incorporated Application Materials) except as modified in Provisions VII.C.

Additionally, facility closure shall also commence:

- a. Upon direction of the TNRCC for violation of the permit, TNRCC Rules, or State Statutes; or
- b. Upon suspension, cancellation, or revocation of the terms and conditions of this permit concerning the authorization to receive, store, process, or dispose of waste materials; or
- c. Upon abandonment of the site;

2. Request for Permit Modification or Amendment

The permittee shall submit a written request for a permit modification or amendment to authorize a change in the approved Closure Plan(s), in accordance with 40 CFR 264.112 (c). The written request shall include a copy of the amended Closure Plan(s) for approval by the Executive Director.


3. Time Frames for Modification\Amendment Request Submittal

The permittee shall submit a written request for a permit modification or amendment in accordance with the time frames in 40 CFR 264.112 (c)(3).

4. Closure Notice and Certification Requirements

- a. The permittee shall notify the Executive Director, in writing, at least 60 days prior to the date on which he expects to begin partial or final closure of a surface impoundment, or landfill unit, or final closure of a facility with such a unit; or at least 45 days prior to the date on which he expects to begin partial or final closure of a facility with processing or storage tanks, container storage, or incinerator units; or at least 45 days prior to the date on which he expects to begin partial or final closure of a boiler or industrial furnace, whichever is earlier. A copy of the notice shall be submitted to the TNRCC Regional Office.

[VII.A.4.]

-  b. The permittee shall notify the TNRCC Regional Office at least ten (10) days prior to any closure sampling activity required by the permit in order to afford regional personnel the opportunity to observe these events and collect samples.
5. Unless the Executive Director approves an extension to the closure period, as per the requirements of 40 CFR 264.113(b), the permittee must complete partial and final closure activities within 180 days after receiving the final volume of hazardous wastes at the hazardous waste management unit or facility.
6. As per the requirements of 40 CFR 264.115, within 60 days of completion of closure of each permitted hazardous waste surface impoundment, or landfill unit, and within 60 days of the completion of final closure, the permittee shall submit to the Executive Director, by registered mail, with a copy to the TNRCC Regional Office, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved Closure Plan and this permit. The certification, which shall be signed by the permittee and by an independent registered professional engineer, must be in the form described in Provision II.A.6. A closure certification report shall be submitted with the required certifications which includes a summary of the activities conducted during closure and the results of all analyses performed. The certification report shall contain the information required by Provision II.A.6 and 30 TAC Section 335.553(a) (for RRS1 and 2) and 30 TAC Section 335.553(b)(4) (for RRS 3). Documentation supporting the independent registered professional engineer's certification shall be furnished to the Executive Director upon request until the Executive Director releases the permittee from the financial assurance requirements for closure under 40 CFR 264.143(i).
7. Final closure is considered complete when all hazardous waste management units at the facility have been closed in accordance with all applicable closure requirements so that hazardous waste management activities under 40 CFR Part 264 and 265 are no longer conducted at the facility unless subject to the provisions in 40 CFR 262.34.
8. All units, sumps, pumps, piping and any other equipment or ancillary components which have come in contact with hazardous wastes shall either be decontaminated by removing all waste, waste residues, and sludges or be disposed of at an authorized off-site facility.
9. All contaminated equipment/structures, liners, dikes, and soils (i.e., debris) intended for decontamination shall be decontaminated in a manner which meets or exceeds the debris treatment standards contained in 40 CFR 268.45 or removed and managed at an authorized industrial solid waste management facility.

[VII.A.]

10. All hard-surfaced areas within the hazardous waste management unit areas shall be decontaminated and the wash water generated treated and/or disposed of at an authorized off-site facility.
11. Verification of decontamination shall be performed by analyzing wash water, and as necessary, soil samples for the hazardous constituents which have been in contact with the particular item being decontaminated. In addition, the permittee shall perform visual inspections of the equipment/structures for visible evidence of contamination.
12. Unless it can be demonstrated that soil contamination is unlikely to have occurred, soils shall be sampled and analyzed. Sufficiently detailed analyses of samples representative of soils remaining in non-hard-surfaced areas of the storage and processing facility area shall be performed to verify removal or decontamination of all waste and waste residues.
13. Soil and/or wash-water samples shall be analyzed in accordance with the methods specified in the current editions of "Test Methods for the Evaluation of Solid Waste" (SW-846) or other methods which are officially recommended by the EPA.
14. Decontamination shall be deemed complete when no visible evidence of contamination is observed and when the results from verification sampling and analyses indicate wash water concentrations below RRS1 levels and soil concentrations below RRS1 or RRS2 levels. If the underlying soils are decontaminated or removed to the RRS2 cleanup levels, the permittee shall comply with the deed recordation requirements of 30 TAC Section 335.560.

B. FINANCIAL ASSURANCE FOR CLOSURE (NOT APPLICABLE)C. STORAGE, PROCESSING, AND COMBUSTION UNIT CLOSURE REQUIREMENTS.

The permittee shall close the storage and processing units identified as TNRCC Permit Unit Nos. 1 through 9 in accordance with the approved closure plans, 40 CFR Part 264, subpart G, 40 CFR 264.178 and the Risk Reduction Standards of 30 TAC Chapter 335, Subchapter S.

D. SURFACE IMPOUNDMENT CLOSURE REQUIREMENTS (NOT APPLICABLE)E. LANDFILL CLOSURE AND CERTIFICATION REQUIREMENTS (NOT APPLICABLE)F. CONTAINMENT BUILDINGS CLOSURE REQUIREMENTS (NOT APPLICABLE)G. FACILITY POST-CLOSURE CARE REQUIREMENTS (NOT APPLICABLE)H. POST-CLOSURE FINANCIAL ASSURANCE REQUIREMENTS (NOT APPLICABLE)

PERMIT SECTION VIII. - LIABILITY REQUIREMENTS (NOT APPLICABLE)

PERMIT SECTION IX. - CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS (NOT APPLICABLE)

PERMIT SECTION X. - AIR EMISSION STANDARDS

A. PROCESS VENTS AND EQUIPMENT LEAKS

1. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in Section 382.003 of the Texas Health and Safety Code Ann. or violate Section 382.085 of the Texas Health and Safety Code Ann. If the Executive Director of the TNRCC determines that such a condition or violation occurs, the permittee shall implement additional abatement measures as necessary to control or prevent the condition or violation.
2. Requirements for Subparts AA and BB
 - a. The permittee must comply with the requirements of 30 TAC Section 335.152(a)(17)/40 CFR 264 Subpart AA and 30 TAC Section 335.152(a)(18)/40 CFR Part 264 Subpart BB, as applicable.
 - b. The permittee shall include in the Biennial Report, required in Provision II.B.7., a statement that hazardous waste management units or associated ancillary equipment at this facility are not subject to any of the requirements in Provision X.A.2.a, if these requirements are not applicable to any hazardous waste management units or ancillary equipment at this facility. If at any time hazardous waste management units or associated ancillary equipment become subject to the requirement in Provision X.A.2.a, the permittee must immediately comply with these requirements.
- ** 3. Requirements for Subpart CC
The Permittee must comply with the requirements of 40 CFR 264 Subpart CC, as applicable.

B. TNRCC OFFICE OF AIR QUALITY INFORMATION

- 1 The permittee must comply with the maximum Chemical transfer rates listed in Attachment E.
- 2 This permit covers only those sources of emissions listed in Attachment E entitled "Emission Sources-Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in attachment E.

ATTACHMENT 2

**CONSENT TO REVOCATION OF
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY PERMIT**

I, John A. Roan, Executive Vice President for Business Affairs, acting on behalf of
(Responsible Official)

the University of Texas Southwestern Medical Center at Dallas, Texas, do hereby consent
(Name of Permittee)

to the revocation of Texas Commission on Environmental Quality Permit No. HW-50165-000 pursuant to the provisions of 30 TAC Section 305.67(b).

The status of all activities regulated by Permit HW-50165-000 is stated below:

- 1) CLOSED - Permitted Waste Management Units 1, 2, and 3; corresponding to N.O.R. Units 001, 002, and 003, are closed. Activities were terminated on or about April 21, 2006.
- 2) CLOSED - Permitted Waste Management Units 4, 5, 6, 7, 8, and 9; corresponding to N.O.R. Units 004A through 004F which were never constructed, are closed. Activities were never begun.
- 3) CLOSED - N.O.R. Unit 005 which had never been operated, and which has no corresponding unit shown on the year 2000 revision of HW-50165-000, is closed. Activities were never begun and were officially terminated on or about August 6, 1996.
- 4) CLOSED - N.O.R. Unit 006 which had never been operated, and which has no corresponding unit shown on the year 2000 revision of HW-50165-000, is closed. Activities were never begun and were officially terminated on or about May 14, 1996.

Statement of Facility Continued Operation: The University of Texas at Southwestern Medical Center (UT Southwestern) will continue its operations that generate hazardous wastes. UT Southwestern will manage hazardous wastes in TCEQ-registered less-than-90-day storage units, and will operate in accordance with 30 TAC Chapter 335.

John A. Roan
(Responsible Official's Signature)

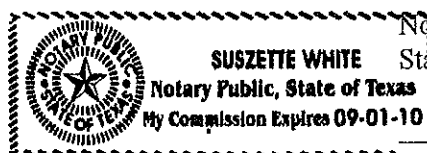
9/11/06
(Date)

BEFORE ME, *Suzette White* on this the 11th day of September 2006,
(Notary's Signature)

personally appeared John A. Roan, Executive Vice President for Business Affairs acting on behalf of the
University of Texas Southwestern Medical Center at Dallas, Texas, known to me to be
(Name of Permittee)

the person and agent of said permittee whose name is subscribed to the foregoing instrument, and that person acknowledged to me that he or she executed the same for the purposes and capacity therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, the Month of 11th day of September 2006



Notary Public in and for the
State of Texas, County of

Suszette White

My commission expires 9-1-10

ATTACHMENT 3

THE UNIVERSITY OF TEXAS
SOUTHWESTERN MEDICAL CENTER
AT DALLAS

Environmental Health and Safety
Radiation Safety
Biological and Chemical Safety
Occupational Safety and Fire Protection

Hazardous Waste
Controlled Substances
Laser Safety

February 15, 2006

Industrial and Hazardous Waste Permit Program MC- 130
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

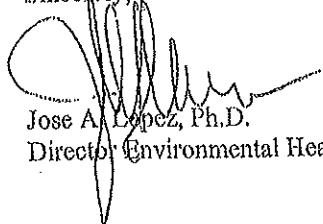
Re: Closure of TNRCC Permit Unit Nos. 1 through 9, N.O.R. Units 001 through 004F
Hazardous Waste Permit No. HW-50165-000
Permit Originally Issued Dec. 6, 1988; Latest Revision Date March 1, 2000
Industrial Solid Waste Registration No. 65014

Dear Permit Program Team:

On April 10, 2006, the University of Texas Southwestern Medical School will begin closure of Permit Storage Unit Nos. 1 through 9 authorized on Hazardous Waste Permit No. HW-50165-000. These nine units are described in the table below:

| Permit Unit No. | N.O.R. Unit No. | Storage Location Description | Comment |
|-----------------|-----------------|----------------------------------|---|
| 1 | 001 | Acid Storage Building Front Room | Will Register New 90-Day Storage Facility on N.O.R. |
| 2 | 002 | Acid Storage Building Back Room | Will Register New 90-Day Storage Facility on N.O.R. |
| 3 | 003 | "S" Building Lab | Is Not Used for Waste Management. Lab Only. |
| 4 | 004 A | ECSC Flammable Storage #1 | ECSC Facility Was Planned But Never Constructed |
| 5 | 004 B | ECSC Flammable Storage #2 | ECSC Facility Was Planned But Never Constructed |
| 6 | 004 C | ECSC Chem Storage #1 | ECSC Facility Was Planned But Never Constructed |
| 7 | 004 D | ECSC Chem Storage #2 | ECSC Facility Was Planned But Never Constructed |
| 8 | 004 E | ECSC Chem Storage #3 | ECSC Facility Was Planned But Never Constructed |
| 9 | 004 F | ECSC Lab | ECSC Facility Was Planned But Never Constructed |

Sincerely,


Jose A. Lopez, Ph.D.
Director Environmental Health and Safety

February 15, 2006
Notification to TCEQ of Closure Start Date, Units on HW-50165-000
Page 1 of 2

5323 Harry Hines Blvd. / Dallas, Texas 75390-9053 / (214)648-2250 Laser Safety (214)590-8043

UT Southwestern Medical Center Dallas RCRA Permit Closure
Final Closure of RCRA Part B Permit HW-50165-000
August 25, 2006
Document Page Number: 094

hard copy:

Sam Barrett, Waste Section Manager
TCEQ Region 4, Dallas/Fort Worth Regional Office
2309 Gravel Drive
Fort Worth, TX 76118-6951

Glenn G. Draper, P.E.
Draper Engineering
2816 Hanover Avenue
Dallas, TX 75225

UT Southwestern EH&S Central Files

February 15, 2006
Notification to TCEQ of Closure Start Date, Units on HW-50165-000
Page 2 of 2

UT Southwestern Medical Center Dallas RCRA Permit Closure
Final Closure of RCRA Part B Permit HW-50165-000
August 25, 2006

Document Page Number: 095

ATTACHMENT 4

TCEQ Acceptance Letter for Closure of Waste
Management Units 001, 002, and 003

for

the University of Texas Southwestern Medical Center
at Dallas

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 13, 2006

Dr. Jose A. Lopez, Director
Environmental Health and Safety
The University of Texas
Southwestern Medical Center at Dallas
5323 Harry Hines Blvd.
Dallas, TX 75390-9053

Re: Acceptance of Closure Certification Report
Hazardous Waste Permit No. 50165
Industrial Solid Waste Registration No. 65014
EPA Identification No. TXD008079527
RN100224757 / CN600131866; WWC12005585-2, 12006413-1

Dear Dr. Lopez:

The Texas Commission on Environmental Quality (TCEQ) has reviewed your Closure Certification Reports dated May 30, 2006 and June 20, 2006 for the Waste Management Units 1, 2, and 3 (Front and Back Acid Storage Rooms and 'S'-Building Container Storage Room, respectively). Based on the information provided in the report, the TCEQ accepts that the closures of these units were completed in accordance with 40 CFR §264.110 through §264.115, the Texas Risk Reduction Program, 30 Texas Administrative Code (TAC), Chapter 350, and Hazardous Waste Permit No. 50165, Provision VIIA.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed as required by 30 TAC §335.4. This requires that hazardous waste must be managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare. If the closure fails to comply with these requirements, the burden remains upon the University of Texas Southwestern Medical Center at Dallas to take any necessary and authorized action to correct such conditions.

Should you have any questions, please contact Dr. Mark L. Shannon of the Industrial & Hazardous Waste Permits Section at 512/239-0944. If responding by letter please include mail code MC 130 in the mailing address.

Sincerely,

William J. Shafford, P.E.

William J. Shafford, P.E. Team Leader
Industrial and Hazardous Waste Permits Section
Waste Permits Division

WJS/MLS/ff

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

printed on recycled paper using soy-based ink

UT Southwestern Medical Center Dallas RCRA Permit Closure
Final Closure of RCRA Part B Permit HW-50165-001
August 25, 2006
Document Page Number: 16

ATTACHMENT 5

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2006

Dr. Jose A. Lopez, Director
Environmental Health and Safety
The University of Texas
Southwestern Medical Center at Dallas
5323 Harry Hines Blvd.
Dallas, TX 75390-9053

Re: Acceptance of Closure Certification Report
Container Storage Units 004A through 004F (N.O.R. Unit 4)
Hazardous Waste Permit No. 50165
Industrial Solid Waste Registration No. 65014
EPA Identification No. TXD008079527
RN100224757 / CN600131866; WWC12005585-2, 12006413-1

Dear Dr. Lopez:

The Texas Commission on Environmental Quality (TCEQ) has reviewed your Closure Certification Report dated July 28, 2006 for the Waste Management Units 004A through 004F (five Container Storage Units (004A-E) and an associated laboratory designated 004F). Based on the information provided in the report, the TCEQ accepts that these units were never constructed and so the closures of these units were completed by default in accordance with 40 CFR §264.110 through §264.115, the Texas Risk Reduction Program, 30 Texas Administrative Code (TAC), Chapter 350, and Hazardous Waste Permit No. 50165, Provision VII.A.

Please be aware that it is the continuing obligation of persons associated with a site to assure that municipal hazardous waste and industrial solid waste are managed as required by 30 TAC §335.4. This requires that hazardous waste must be managed in a manner which does not cause the discharge or imminent threat of discharge of waste into or adjacent to waters in the state, a nuisance, or the endangerment of the public health and welfare. If the closure fails to comply with these requirements, the burden remains upon the University of Texas Southwestern Medical Center at Dallas to take any necessary and authorized action to correct such conditions.

Should you have any questions, please contact Dr. Mark L. Shannon of the Industrial & Hazardous Waste Permits Section at 512/239-0944. If responding by letter please include mail code MC 130 in the mailing address.

Sincerely,

A handwritten signature in dark ink that reads "William J. Shafford, P.E.".

William J. Shafford, P.E. Team Leader
Industrial and Hazardous Waste Permits Section
Waste Permits Division

WJS/MLS/ff

ATTACHMENT 6

THE UNIVERSITY OF TEXAS
SOUTHWESTERN MEDICAL CENTER
AT DALLAS

Environmental Health and Safety
Radiation Safety
Biological and Chemical Safety
Occupational Safety and Fire Protection

Hazardous Waste
Controlled Substances
Laser Safety

August 25, 2006

Re: Final Close Out of RCRA Part B Hazardous Waste Permit No. HW-50165-000
Permittee: University of Texas Southwestern Medical Center
EPA ID Number: TXD071378822, Texas Solid Waste Registration Number: 65014
Original Issuance: December 6, 1988
Most Recent Revision: March 1, 2000 with Expiration Date March 1, 2010

Dr. Mark Shannon, Mail Code 130
12100 Park 35 Circle, Building F
TCEQ Industrial & Hazardous Waste Permits Program (MC-130)
Austin, TX 78753

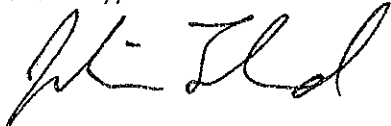
Dear Dr. Shannon,

Please find enclosed the Final Closure Package for RCRA Hazardous Waste Permit No. HW-50165-000 issued to the University of Texas Southwestern Medical Center (UT Southwestern). The document index, the summary of hazardous chemical waste storage units, and the documents referenced in the document index show that UT Southwestern has officially closed out all hazardous waste management units permitted under HW-50165-000. Additionally, the enclosed STEERS and N.O.R. documents show that UT Southwestern is now managing all of its hazardous chemical wastes in less than 90-day storage units registered with the Texas Commission on Environmental Quality (TCEQ).

UT Southwestern requests that the TCEQ close RCRA Hazardous Waste Permit No. HW-50165-000. UT Southwestern also requests that the TCEQ update UT Southwestern's STEERS account to show that Hazardous Waste Management Units 001, 002, 003, and 004 are INACTIVE. Hazardous Waste Management Units 007 and 008 should remain ACTIVE as less than 90-day storage units.

Should you have any questions, please do not hesitate to contact Mr. Julien Farland at (214) 648-2250. If you require a comprehensive document summary in addition to the document index and summary of hazardous chemical waste storage units, please contact Ms. Terry Capone at (214) 648-9736.

Sincerely,



JOSE A. LOPEZ, Ph.D, Director, Environmental Health & Safety

Mr. Julien Farland, Assistant Director
signing as designee for Dr. Jose Lopez

cc: Sam Barrett, Waste Section Manager Dallas/Fort Worth Regional Office
TX Commission on Environmental Quality Region 4
2309 Gravel Drive
Fort Worth, TX 76118-6951

Surveillance Section (6EN-AS)
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

UNIVERSITY OF TEXAS SOUTHWESTERN MEDICAL CENTER at DALLAS

FINAL CLOSURE OF RCRA PART B PERMIT HW-50165-000

INDEX TO DOCUMENTS SHOWING CLOSURE OF ALL PERMITTED HAZARDOUS WASTE MANAGEMENT UNITS COVERED BY HW-50165-000

| | DOCUMENT ID | DOCUMENT DESCRIPTION | DOCUMENT PAGE NUMBERS INCLUDING FLY SHEET |
|---|--|--|--|
| 1 | University of Texas Southwestern Medical Center, Dallas, Texas, Summary of Hazardous Chemical Waste Storage Units as of August 18, 2006 | <ul style="list-style-type: none"> Table summarizes ACTIVE and CLOSED units and references closure documentation | 001-002 |
| 2 | RCRA Part B Permit for Industrial Solid Waste Management Site Issued Under Provisions of Texas Health and Safety Code Chapter 361, RCRA Part B Permit Number: HW-50165-000 | <ul style="list-style-type: none"> EPA ID Number: TXD071378822 Texas Solid Waste Registration Number: 65014 Original Issuance: December 6, 1988 Most Recent Revision: March 1, 2000 Permitee: University of Texas Southwestern Medical Center at Dallas Expiration: March 1, 2010 | 003-034 |
| 3 | TCEQ STEERS Information for the University of Texas Southwestern Medical Center at Dallas | <ul style="list-style-type: none"> List and Description of Waste Management Units for Texas Solid Waste Registration Number 65014 Last update 08/18/2006 STEERS shows units 001, 002, 003, and 004 as ACTIVE. This package shows these units as recently CLOSED. STEERS correctly shows Units 007 and 008 as ACTIVE <90-Day Storage units. STEERS correctly shows Units 005 and 006 as CLOSED. | 035-044 |
| 4 | TCEQ Notice of Registration (N.O.R.) for Industrial and Hazardous Waste, Texas Solid Waste Registration Number 65014 | <ul style="list-style-type: none"> EPA ID Number: TXD071378822 Last update 06/06/06 | 045-052 |
| 5 | RCRA Part B Permit HW-50165-000 Closure Plan | <ul style="list-style-type: none"> Section VII Closure Plan (from HW-50165-000 Permit Application; not shown on excerpted document) Inside document pages link this document with HW-50165-00; "This document contains the closure plan to close out the hazardous waste facilities at the UT Southwestern Medical Center located at the intersection of Inwood Road and Harry Hines Boulevard, Dallas, Texas." Date: June 1, 1998 Revision: 0 | 053-092 |
| 6 | 45-Day Notification for Closure of RCRA Part B Permit Waste Management Units, For Waste Management Units 1 through 9 Equivalent to N.O.R. Units 001 through 004F | <ul style="list-style-type: none"> From: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas To: Industrial and Hazardous Waste Permit Program MC-130, TCEQ Austin Date: February 15, 2006 | 093-095 |

UNIVERSITY OF TEXAS SOUTHWESTERN MEDICAL CENTER at DALLAS

FINAL CLOSURE OF RCRA PART B PERMIT HW-50165-000

INDEX TO DOCUMENTS SHOWING CLOSURE OF ALL PERMITTED HAZARDOUS WASTE MANAGEMENT UNITS COVERED BY HW-50165-000

| | DOCUMENT ID | DOCUMENT DESCRIPTION | DOCUMENT PAGE NUMBERS INCLUDING FLY SHEET |
|----|---|---|--|
| 7 | Fax With Professional Engineer's Certified Statement of Observations for Closure, For Waste Management Units 001 and 002 | <ul style="list-style-type: none"> The Engineer certified that no cracks or leaks were observed in the slab or slab-to-wall joints of the building containing Waste Management Units 1 and 2 (001 and 002). From: Glenn G. Draper, P.E., Draper Engineering To: Terry Capone, UT Southwestern Medical Center Date: 5/1/06 | 096-098 |
| 8 | First Transmittal of Closure Certification and Closure Report for Waste Management Units 001 and 002 | <ul style="list-style-type: none"> Transmitted by: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas Transmitted to: Industrial & Hazardous Waste Permits Program (MC-130), TCEQ Austin Transmittal Date: May 30, 2006 Report Prepared by: Glenn G. Draper Engineering Report Date: May 2006 Permittee Certification: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas, 6/1/06 Registered Professional Engineer Certification: Glenn G. Draper, 5/16/06 | 099-128 |
| 9 | Second Transmittal of Closure Certification and Closure Report for Waste Management Units 001 and 002 | <ul style="list-style-type: none"> Dr. Shannon did not receive first transmittal so package was re-sent. Transmitted by: Terry Capone, Environmental Health & Safety, Environmental Compliance, UT Southwestern Medical Center Transmitted to: Mark Shannon, Mail Code 130, TCEQ Industrial & Hazardous Waste Permits Program (MC-130), Austin Transmittal Date: July 6, 2006 Transmitted Report and Certifications: Same as First Transmittal; See Above | 129-161 |
| 10 | TCEQ Acceptance Letter for Closure of Waste Management Units 001, 002, and 003 | <ul style="list-style-type: none"> From: William J. Shafford, P.E., Team Leader, Industrial and Hazardous Waste Permits Section, Waste Permits Division, TCEQ Austin To: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas Date: July 13, 2006 | 162-163 |
| 11 | Letter Report by Permittee for Closure of Waste Management Unit 003 | <ul style="list-style-type: none"> Letter Report by: Terry Capone, Environmental Compliance Manager, Biological/Chemical Safety, The University of Texas Southwestern Medical Center at Dallas Report to: Glenn Draper, P.E., Glenn G. Draper Engineering Letter Report Date: June 5, 2006 | 164-166 |

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| | DOCUMENT ID | DOCUMENT DESCRIPTION | DOCUMENT PAGE NUMBERS INCLUDING FLY SHEET |
|----|---|---|---|
| 12 | Closure Certification and Closure Report for Waste Management Unit 003 | <ul style="list-style-type: none"> Transmitted by: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas Transmitted to: Industrial & Hazardous Waste Permits Program (MC-130), TCEQ Austin Transmittal Date: June 20, 2006 Report Prepared by: Glenn G. Draper Engineering Report Date: June 2006 Permittee Certification: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas, 6/20/06 Registered Professional Engineer Certification: Glenn G. Draper, 6/9/06 | 167-185 |
| 13 | TCEQ Acceptance Letter for Closure of Waste Management Units 001, 002, and 003 (Duplication of the letter here is intentional to show acceptance of closure of 003 in chronological order.) | <ul style="list-style-type: none"> From: William J. Shafford, P.E., Team Leader, Industrial and Hazardous Waste Permits Section, Waste Permits Division, TCEQ Austin To: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas Date: July 13, 2006 | 186-187 |
| 14 | Closure Certification and Closure Report for STEERS Waste Management Unit 004, Equivalent to N.O.R. Units 004 A through 004 F | <ul style="list-style-type: none"> Transmitted by: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas Transmitted to: Mark Shannon, Mail Code 130, TCEQ Industrial & Hazardous Waste Permits Program, Austin Transmittal Date: July 28, 2006 Report Prepared by: Glenn G. Draper Engineering Report Date: May 2006 Permittee Certification: Jose A. Lopez, Ph.D., Director Environmental Health and Safety, University of Texas Southwestern Medical Center at Dallas, 7/28/06 Registered Professional Engineer Certification: Glenn G. Draper, 5/19/06 | 188-198 |
| 15 | TCEQ Acceptance Letter for Closure of Waste Management Unit 004, Equivalent to N.O.R. Units 004 A through 004 F | <ul style="list-style-type: none"> From: PENDING To: PENDING Date: PENDING The acceptance letter has not been received. The waste management unit was never constructed. | <p>Fly sheet place holder, document page 199</p> <p>Pending Statement in place of document page 200</p> |

UNIVERSITY OF TEXAS SOUTHWESTERN MEDICAL CENTER at DALLAS

FINAL CLOSURE OF RCRA PART B PERMIT HW-50165-000

INDEX TO DOCUMENTS SHOWING CLOSURE OF ALL PERMITTED HAZARDOUS WASTE MANAGEMENT UNITS COVERED BY HW-50165-000

| | DOCUMENT ID | DOCUMENT DESCRIPTION | DOCUMENT PAGE NUMBERS INCLUDING FLY SHEET |
|----|---|--|--|
| 16 | Group of Documents for Closure of Environmental Control Processing Center Building (the Incinerator Building); Listed on N.O.R. and STEERS as Waste Management Unit 005 | <ul style="list-style-type: none"> Documents dated from May 9, 1996 through August 22, 1996 Documents include Notification of Closure, Professional Engineer's Closure Report With Analytical Results and Professional Engineer's Certification, and Correspondence from the Texas Natural Resource Conservation Commission (TNRCC) Austin | 201-214 |
| 17 | Group of Documents Showing Acceptance of Closure Three Times by the TNRCC for the Environmental Control Processing Center Building (the Incinerator Building); Listed on N.O.R. and STEERS as Waste Management Unit 005 | <ul style="list-style-type: none"> The first two TNRCC Acceptance of Closure Letters were dated December 13, 1996 and December 11, 1998. Available documents do not explain the second Acceptance of Closure. Emissions correspondence from Derek Rodricks of TNRCC Austin Air Permits Division shows that the TNRCC database was not updated to show that the incinerator building was closed. This apparently resulted in a need for the third Acceptance of Closure in November 2000. Third Acceptance of Closure From: Gary Beyer, Project Manager, Team IV, Corrective Action Section, Remediation Division, TNRCC Austin Third Acceptance of Closure To: Peter H. Fitzgerald, The University of Texas Southwestern Medical Center at Dallas Third Acceptance of Closure Date: November 14, 2000 | 215-226 |
| 18 | Group of Documents for Closure of the Incinerator, Liquid Injection System, and Feed Tank; Listed on N.O.R. and STEERS as Waste Management Unit 006-Incinerator | <ul style="list-style-type: none"> Documents dated from May 10, 1991 through May 28, 1996 Documents include Request to Close Without Decontamination (incinerator was never used), Approval by the Texas Water Commission to Close Without Decontamination, Notification of Closure, and Professional Engineer's Closure Report With Professional Engineer's Certification | 227-240 |
| 19 | TNRCC Acceptance Letter for Closure of the Incinerator, Liquid Injection System, and Feed Tank; Listed on N.O.R. and STEERS as Waste Management Unit 006-Incinerator | <ul style="list-style-type: none"> From: Wade M. Wheatley, P.E., Supervisor, Facility Team IV, Permits Section, Industrial and Hazardous Waste Division, TNRCC Austin To: Peter H. Fitzgerald, Ph.D., the University of Texas Southwestern Medical Center at Dallas Date: August 2, 1996 | 241-242 |

University of Texas Southwestern Medical Center
Dallas, Texas
Summary of Hazardous Chemical Waste Storage Units
as of August 18, 2006

**UNIVERSITY OF TEXAS SOUTHWESTERN MEDICAL CENTER, DALLAS, TEXAS
AUGUST 2006 SUMMARY OF HAZARDOUS CHEMICAL WASTE STORAGE UNITS**

| RCRA Permit HW-50165-000 Unit Number | N.O.R. Unit Number | STEERS Unit Number | Unit Description | STEERS Status as of 8/18/06 | True Status as Shown by This Package | Comment on True Status, With Document Page Number Referenced in Parentheses |
|---|--|--|--|-----------------------------------|---|--|
| 1 | 001 | 001 | Acid Storage Bldg Front Room | ACTIVE | CLOSED | Professional Engineer Certified 001 and 002 as Closed May 16, 2006 (p. 104) |
| 2 | 002 | 002 | Acid Storage Bldg Back Room | ACTIVE | CLOSED | The TCEQ Accepted Closure per Letter Dated July 13, 2006 (p. 163) |
| 3 | 003 | 003 | S Building Laboratory | ACTIVE | CLOSED¹ | Professional Engineer Certified 003 as Closed June 9, 2006 (p. 172) The TCEQ Accepted Closure per Letter Dated July 13, 2006 (p. 187) |
| 4 5 6 7 8 9 | 004 A 004 B 004 C 004 D 004 E 004 F | 004 004 004 004 004 004 | ECSC ² Flmbl Storage #1 ECSC Flmbl Storage #2 ECSC Chem Storage #1 ECSC Chem Storage #2 ECSC Chem Storage #3 ECSC Laboratory | ACTIVE | CLOSED (was never constructed) | Professional Engineer Certified 004A - 004F as Closed May 19, 2006 (p. 193) Certified Closure Transmitted July 28, 2006 (p. 189); Acceptance of Closure by the <i>closed</i> TCEQ is Pending <i>9-5-06</i> |
| Not Shown on March 2000 Revision | 005 | 005 | Environmental Control Processing Center Bldg (the Incinerator <u>Building</u>) | CLOSED | CLOSED | Professional Engineer Certified 005 as Closed August 6, 1996 (p. 213) The TNRCC Accepted Closure per Letters Dated: December 13, 1996 (p. 216) December 11, 1998 (p. 218) November 14, 2000 (p. 225) |
| Not Shown on March 2000 Revision | 006 | 006 | Incinerator, fixed hearth\nUnit (the Incinerator, Liquid Injection System, and Feed Tanks) | CLOSED | CLOSED (was never operated) | Professional Engineer Certified 006 as Closed May 14, 1996 (p. 240) The TNRCC Accepted Closure per Letter Dated August 2, 1996 (p. 242) |
| N/A; RCRA Permit Exempt <90-Day Storage | 007 | 007 | NB Building North Campus Waste Storage | ACTIVE | ACTIVE | Registered on STEERS for <90-Day Storage (p. 043) Must remain ACTIVE. |
| N/A; RCRA Permit Exempt <90-Day Storage | 008 | 008 | RV Unit South Campus Chemical Waste Storage Room | ACTIVE | ACTIVE | Registered on STEERS for <90-Day Storage (p. 044) Must remain ACTIVE. |

¹The S Building Laboratory is now officially closed as a Waste Management Unit, and was not being operated as a Waste Management Unit prior to closure. The S Building Laboratory continues to operate as a University Laboratory.

²ECSC = Environmental Control Storage Center